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**John W. Kure**  
Executive Director – Public Policy



**Ex Parte**

July 25, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-B204  
Washington, DC 20554

Re: In the Matter of Developing a Unified Inter-carrier Compensation Regime  
CC Docket No. 01-92

Dear Ms. Dortch:

On Friday and Saturday, July 22 and 23, 2005, I participated in the NARUC Inter-carrier Compensation Workshop VII in Austin, Texas. Among the people present at the workshop were Jane Jackson and Randy Clarke of the Commission's Wireline Competition Bureau. During the workshop I discussed Interconnection at the Edge as shown in the attached material. I also briefly described the Qwest plan for reforming inter-carrier compensation as described in the Qwest comments and reply comments filed in this proceeding on May 23 and July 20, respectively, of this year.

Pursuant to FCC Rule 1.49(f), this *ex parte* is being filed electronically via the Electronic Comment Filing System for inclusion in the public record of the above-referenced docket pursuant to FCC Rule 1.1206(b)(2).

Sincerely,

/s/ John W. Kure

cc: Randy Clarke (via e-mail at [randy.clarke@fcc.gov](mailto:randy.clarke@fcc.gov))  
Jane E. Jackson (via e-mail at [jane.jackson@fcc.gov](mailto:jane.jackson@fcc.gov))

Attachment

# **Interconnection at the Edge**

July 14, 2005

## Default rules

- Each carrier must have Edge(s) within the LATA
- Each carrier responsible for transporting its traffic to the receiving carrier's Edge
- Industry standards used for direct vs. tandem routing of traffic

# Edges

- Access tandems for hierarchical carriers
- Local switch if not hierarchical
- If no local switch, a facilities based Edge in the LATA
- POPs for IXC's

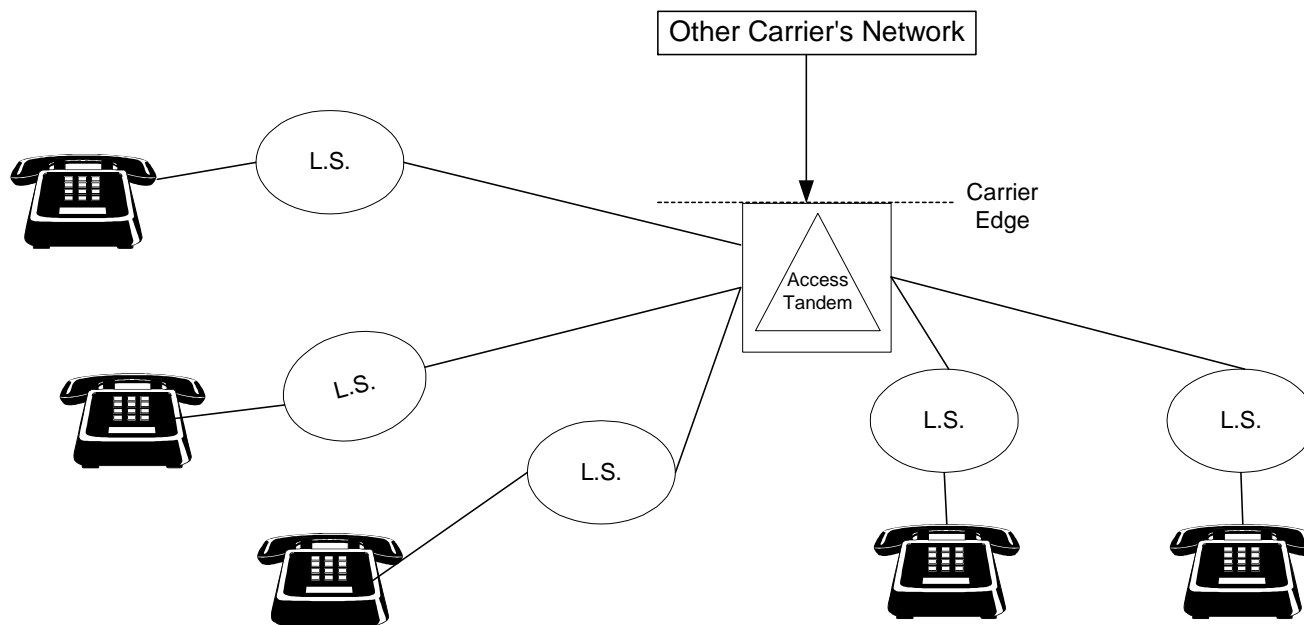
# Transiting

- Sending carrier pays the transiting carrier for transporting the traffic to the receiving carrier

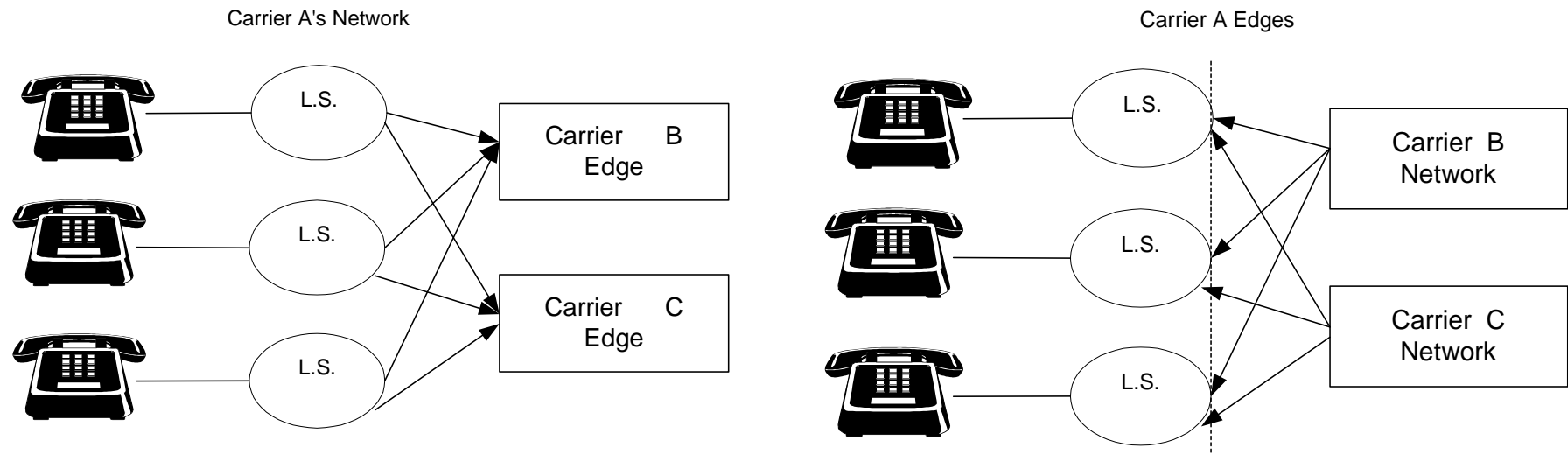
# Negotiations

- Default rules apply only if negotiations fail.

## Edge of Hierarchical Circuit Switched Network

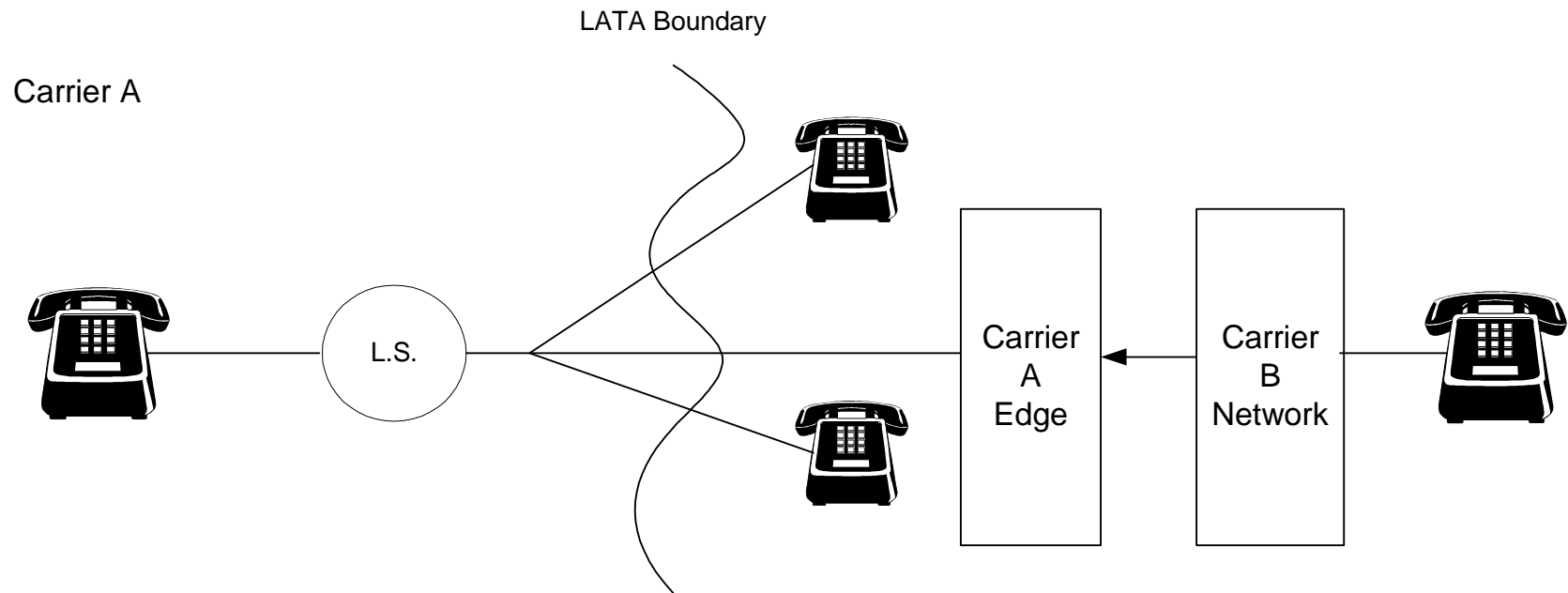


## Non-Hierarchical Circuit Switched Network

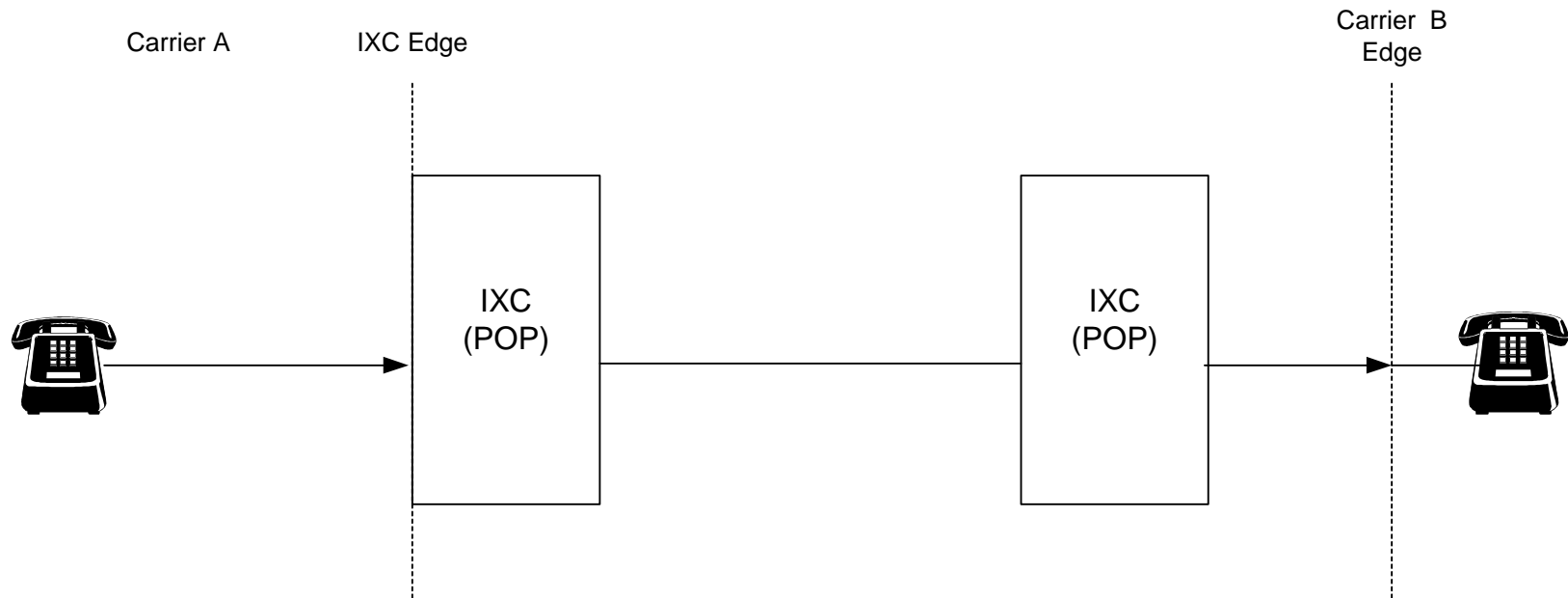




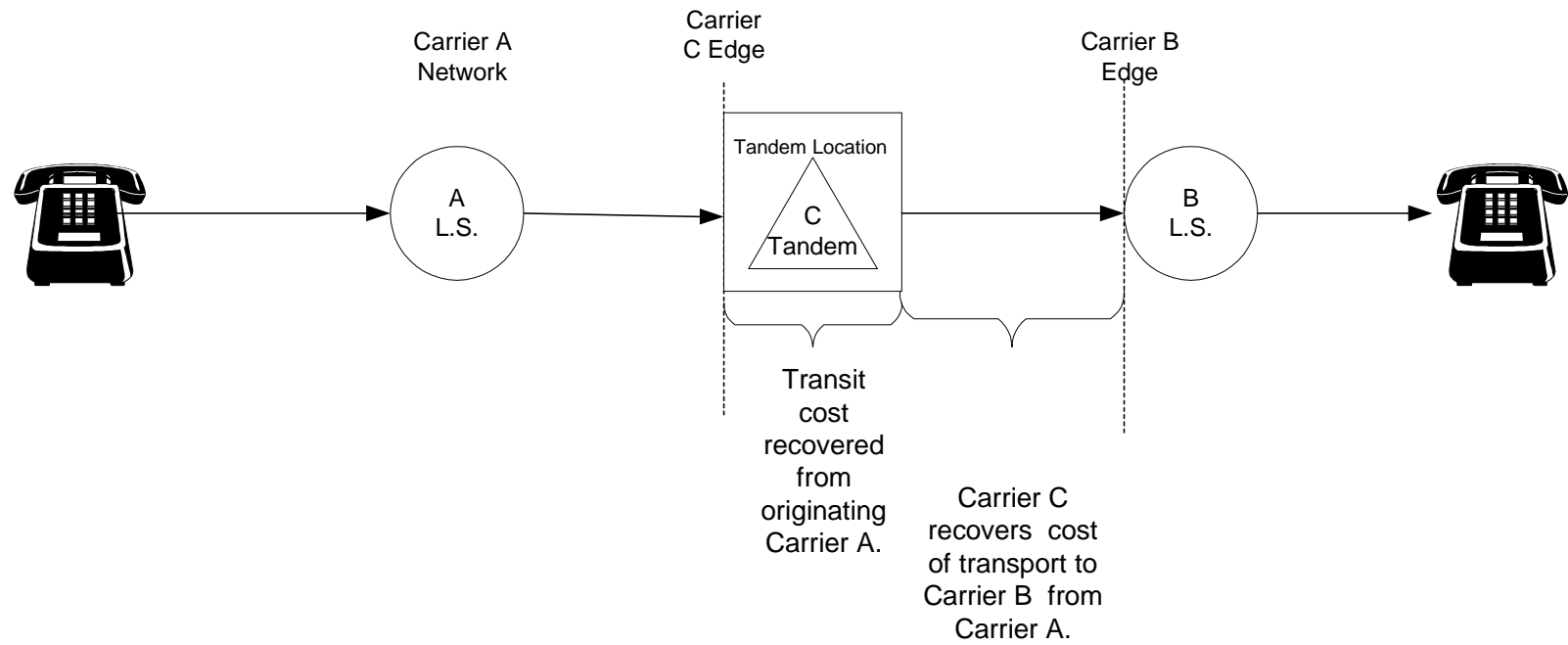
## Switch Not in Served LATA



## Interexchange Carrier Edge



# Transit



# **Keep Interconnection at the Edge Simple**

- Has few rules
- Lets negotiations work
- Gives both carriers negotiating power